



July 8, 2004

Docket No. 03-AAER-1
California Energy Commission
1516 Ninth Street, Mail Station 4
Sacramento, California 95814-5512

The Electronic Industries Alliance (EIA) and the Consumer Electronics Association (CEA) would like to submit the following comments based on the proposals discussed at the California Energy Commission's Workshop on Amendments to Appliance Efficiency Regulations held on May 27th and 28th, 2004.

EIA and CEA strongly urge the CEC to remove TVs, compact audio equipment, DVD players, and set-top boxes from consideration for maximum allowable standby energy use standards. We look forward to submitting more detailed comments on the specific proposals within the next two weeks.

In addition, EIA and CEA are very concerned about the process by which CEC is pursuing these standards. The recent workshop was scheduled with only two weeks' notice, and in conflict with an International Energy Agency conference that dealt with one of the products under consideration. The CASE studies supporting the staff recommendations were made available less than one week before the workshop. This is not adequate time for stakeholders to evaluate and respond to the proposals. EIA and CEA were never contacted by the CEC consultant that prepared these proposals, nor, to our knowledge, were any of the manufacturers of these electronics consulted. Many of the mistaken assumptions in the reports could have been more effectively addressed had these steps taken place.

Moreover, it is unclear how the CEC plans to proceed with the approximately thirty new product standards proposals that were introduced. Specifically, it is doubtful whether certain categories that require more evaluation would proceed on a different schedule, or, given the CEC's apparent haste, whether all product categories would proceed concurrently regardless of stakeholder concerns? EIA and CEA believe it would be helpful to all interested parties to have a document that clearly identifies the steps the CEC will take in order to decide whether to pursue the proposed product standards.

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We look forward to a response from the Commission and staff on this issue of great importance to the high tech industry.

Sincerely,

Jason Linnell
Senior Manager, Environmental Affairs
Electronic Industries Alliance

Douglas Johnson
Senior Director, Technology Policy
Consumer Electronics Association

About CEA: CEA represents more than 1,500 corporate members involved in the design, development, manufacturing, distribution and integration of audio, video, mobile electronics, wireless and landline communications, information technology, home networking, multimedia and accessory products, as well as related services that are sold through consumer channels. CEA also produces the nation's largest annual trade event, the International Consumer Electronics Show. www.ce.org

About EIA: EIA appreciates the opportunity to provide the views of the high-tech industry concerning SB 20. The Electronic Industries Alliance (EIA) is the national trade organization that includes the full spectrum of U.S. manufacturers, representing more than 80% of the \$550 billion electronics industry. The Alliance is a partnership of electronic and high-tech associations representing more than 2500 companies. EIA member companies make products ranging from the smallest electronic components to the most complex systems used by defense, space and industry. www.eia.org